



32991 Hamilton Court  
Farmington Hills, MI 48334  
(248) 699-4000

February 6, 2006

***VIA ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: ACN Communication Services, Inc.  
Certification of CPNI Filing (February 6, 2006)  
EB Docket No 06-36  
EB-06-IC-060

Dear Ms Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),<sup>2</sup> ACN Communication Services, Inc. (the "Company") submits this Compliance Statement and Certificate. Protecting CPNI is an important obligation for all telecommunications carriers and the Company has adopted various operational procedures to assure that all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

As requested by the Public Notice, the undersigned, as an officer of the Company, certifies based upon personal knowledge that the following Compliance Statement describes the operational procedures and policies implemented by the Company to ensure the privacy of its customers' CPNI consistent with the Commission's CPNI rules.

---

<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice")

<sup>2</sup> 47 C.F.R. § 64.2001, *et seq.*

## **STATEMENT OF COMPLIANCE WITH CPNI RULES**

As permitted by the CPNI rules, the Company uses CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing carrier premises equipment and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services

The Company sells local exchange and long distance services. The local exchange service is bundled with long distance service, so the Company's marketing to existing customers consists only of marketing combined local exchange and long distance service to legacy long distance users.

All out-bound marketing campaigns fall under the supervisory purview of David Stevanovski, President of the Company and the maker of this statement. For purposes of this marketing, in the event that the Company needs to access CPNI, the Company's requests for authorization to access CPNI are made on a "One-Time Use" basis, where the Company obtains the customer's oral consent to use CPNI for the duration of a single in-bound or out-bound call, or based upon the opt-out methodology permitted by the CPNI rules. The Company maintains records of its outbound marketing efforts in its customer record database. All customer service personnel, account managers and other sales personnel are required to record in the Company database their contacts with the customer. These records are stored for at least one year. In the past, the Company has used an outside company to offer the Company's bundled local and long distance service to its legacy long distance only customers. Any customer information provided to this outside company is covered by a confidentiality agreement protecting the customer information.

The Company does not use CPNI for marketing Non-Communications related services to its customers.

When customers initiate contact with questions about products and services, the Company representatives verify that the caller is the authorized customer on the account in question by confirming identity. The customer is then asked for permission to access the account records in order to appropriately address questions.


The Company also does not sell or share its customer proprietary network information to suppliers, vendors or others for the purposes of marketing non-Company telecommunications or information services. The Company uses an outside customer print vendor that is subject to a nondisclosure/confidentiality agreement that insures all CPNI is kept confidential. As general corporate policy, the Company requires an executed confidentiality agreement with all outside vendors before any customer related information, confidential or otherwise, is provided to the outside vendor.

The Company has implemented policies that require its employees to protect the confidentiality of CPNI. The policies restrict access to customer records to those employees

with a need to know, e.g. employees involved in billing, carrier invoice reconciliation, and customer service. The policies provide for employee training concerning the authorized and unauthorized use of CPNI, and require the confidentiality of customer records and CPNI, including, but not limited to, information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of the Company.

The Company expects its employees and agents to act in accordance with all governing State and Federal laws, rules and regulations. The Company's policies and procedures including its Employee Handbook define confidential information and mandate strict compliance with its nondisclosure requirements. Failure to abide by these rules that protect customer confidential information subject the employee to disciplinary action, up to and including termination of employment. Employees are required to review the ACN Employee Handbook at least annually. The Company records each employee's compliance with this requirement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dave Stevanovski". The signature is fluid and cursive, with a large initial "D".

David Stevanovski  
President  
ACN Communication Services, Inc.

cc: Bryon McKoy via e-mail: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)